#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN - SOUTHERN DIVISION

NATALIE REESER,

Case No. 2:14-cv-11916-GCS-MJH

Plaintiff, Hon. George Caram Steeh

 $\mathbf{v}$ 

### HENRY FORD HEALTH SYSTEM,

Defendant.

MILLER COHEN, P.L.C.	VARNUM LLP
Keith D. Flynn (P74192)	Terrance J. Miglio (P30541)
Adam C. Graham (P79361)	Barbara E. Buchanan (P55084)
Attorneys for Plaintiff	Attorneys for Defendant
600 W. Lafayette Blvd., 4th Floor	160 W. Fort, 5th Floor
Detroit, MI 48226-0840	Detroit, MI 48226
(313) 964-4454	(313) 481-7300

## PLAINTIFF'S EXPARTE MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR REPLY BRIEF IN SUPPORT OF SUPPLEMENTAL MOTION FOR ATTORNEYS' FEES POST-JUDGMENT AND ON APPEAL

NOW COMES Plaintiff NATALIE REESER, by and through her counsel, with her request that this Court allow Plaintiff to file a Reply Brief in Support of her Motion for Attorneys' Fees that exceeds the seven page limit established by L.R. 7.1(d)(3)(B) by an additional thirteen (13) pages. Defendant's Brief in Opposition to Plaintiff's Motion is thirty three (33) pages long and includes 121 (one hundred and twenty one) pages of exhibits. A seven page reply is not sufficient to address each of the issues raised by Defendant. For this reason, Plaintiff requests an extension to twenty (20) pages to adequately address Defendant's arguments.

Plaintiff sought concurrence and was unable to obtain a response.

Respectfully submitted,

MILLER COHEN, P.L.C.

By: /s/Adam C. Graham
Keith D. Flynn (P74192)
Adam C. Graham (P79361)
Attorneys for Plaintiff
600 W. Lafayette Blvd., 4th Floor
Detroit, MI 48226
(313) 964-4454

Dated: July 31, 2017

#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

#### NATALIE REESER,

Plaintiff,

V

Case No. 2:14-cv-11916-GCS-MJH Hon. George Caram Steeh Magistrate Judge Mona K. Majzoub

# HENRY FORD HEALTH SYSTEM d/b/a HENRY FORD HOSPITAL,

Defendant.

MILLER COHEN, P.L.C.

(313) 964-4454

Richard G. Mack, Jr. (P58657) Keith D. Flynn (P74192) Adam C. Graham (P79361) Attorneys for Plaintiff 600 W. Lafayette Blvd., 4<sup>th</sup> Floor Detroit, MI 48226-0840 VARNUM LLP

Terrance J. Miglio (P30541) Barbara E. Buchanan (P55084) *Attorneys for Defendant* 160 W. Fort St., 5<sup>th</sup> Floor Detroit, MI 48226 (313) 481-7300

## **CERTIFICATE OF SERVICE**

I hereby certify that on *July 31 2017*, the foregoing document was electronically filed by the undersigned's authorized representative, using the ECF system, which will send notification of such filing to all parties of record.

Respectfully submitted,

MILLER COHEN, P.L.C.

By: /s/ Adam C. Graham

Adam C. Graham (P79361) Attorneys for Plaintiff 600 W. Lafayette Blvd., 4<sup>th</sup> Floor Detroit, Michigan 48226 (313) 964-4454